

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JEFFREY ROLLINS DAVIS d/b/a
DAVIS LAW FIRM,
Plaintiff

v.

JONATHAN J. ZAGER AND JZ
PRODUCTIONS, INC.,
Defendants.

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CASE NO 5:23-CV-791-JKP

**JOINT STIPULATION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND**

The Parties, by and through their undersigned attorneys, hereby stipulate and respectfully request that the Court extend the time for responsive pleadings in this matter. In support of same, the Parties would show as follows:

WHEREAS, Plaintiff filed Plaintiff's Original Complaint [Doc. 1] on June 23, 2023;

WHEREAS, Defendant, JZ Productions, Inc. ("JZ Productions"), was served with the Summons and Complaint on June 29, 2023 [Doc. 8], and the current answer deadline is July 20, 2023;

WHEREAS, Defendant, Jonathan J. Zager ("Zager"), was served with the Summons and Complaint on June 30, 2023 [Doc. 7], and the current answer deadline is July 21, 2023;

WHEREAS, the Parties have agreed to mediate this case early and have scheduled a Zoom mediation with the Hon. Allyson K. Duncan (Ret.) on August 17, 2023;

NOW THEREFORE, the Parties hereby agree and stipulate to the following:

1. The deadline for Zager and JZ Productions (collectively, "Defendants") to file their respective answer or other responsive pleading to Plaintiff's Original Complaint is extended to August 24, 2023 (seven (7) calendar days after the date of mediation).

2. In the event any of the Defendants file a counterclaim in this cause against Plaintiff or any affiliate of Plaintiff, the deadline by which Plaintiff or any such affiliate of Plaintiff must file an answer or other responsive pleading to such counterclaim shall be 56 days after the date Defendants file such counterclaim.

The Parties have not previously requested any extensions of deadlines for responsive pleadings.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that the Court enter an order in the form attached hereto extending the responsive pleadings deadlines as stipulated above.

Date: July 20, 2023.

Respectfully submitted,

DAVIS CEDILLO & MENDOZA
755 E. Mulberry Ave., Suite 500
San Antonio, TX 78212

/s/ Brandy C. Peery

Brandy Chantal Peery
Texas Bar No. 24057666
Tel: (210) 822-6666
Fax: (210)-822-1151
Email: bpeery@lawdcm.com
Ricardo G. Cedillo
Texas Bar No. 04043600
Tel: (210) 822-6666
Fax: (210) 822-1151
Email: rcedillo@lawdcm.com
-and-

DUNHAM, LLP
919 Congress Ave., Suite 910
Austin, TX 78701

/s/ Cory A Scanlon

Cory A. Scanlon
Texas Bar No. 24104599
Tel: (512) 615-1255
Fax: (512) 615-1256
Email: cory@dunhamllp.com
David E. Dunham
Texas Bar No. 06227700
Tel: (512) 615-1255
Fax: (512) 615-1256
Email: david@dunhamllp.com

ATTORNEYS FOR PLAINTIFF

RESNICK & LOUIS, P.C.
1512 Center Street, Suite 100
Houston, TX 77007

/s/ Mary Holmesly

Mary Holmesly
Texas Bar No. 240579077
Tel: (281) 724-5580
Fax: (281) 724-5580
Email: mholmesly@rlattorneys.com
Jason A. Rose
Texas Bar No. 24033016
Tel: (281) 768-4064
Fax: (281) 768-4064
Email: jarose@rlattorneys.com
-and-

MANNING & KASS
801 South Figueroa Street
15th Floor
Los Angeles, CA 90017

/s/ Jeffrey M. Lenkov

Jeffrey M. Lenkov*
California Bar No. 156478
Tel: (213) 430-2632
Fax: (213) 624-6999
Email: jml@manningllp.com
*Pro hac vice admission will be sought

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

THIS WILL CERTIFY that a true and correct copy of the foregoing instrument has been served on all attorneys of record in this cause of action pursuant to Federal Rules of Civil Procedure on July 20, 2023.

/s/ Mary Holmesly
Mary Holmesly